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Sir Christopher Gent, Roland A. Hernandez, Henry
Kaufman and John D. Macomber

*[Also filed by Richard S. Fuld, Jr., Christopher
M. O'Meara, Joseph M. Gregory, Erin Callan
and Ian T. Lowitt]*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
	:
-----X	


**NOTICE OF SECOND REVISED PROPOSED ORDER
GRANTING INSURED PERSONS' MOTION, PURSUANT TO
SECTION 362 OF THE BANKRUPTCY CODE, FOR AN ORDER
MODIFYING THE AUTOMATIC STAY TO ALLOW SETTLEMENT
PAYMENT UNDER DIRECTORS AND OFFICERS INSURANCE POLICY**

PLEASE TAKE NOTICE that in connection with the hearing to be held on
October 19, 2011 at 10:00 a.m. with respect to the motion (the "Motion") [ECF No. 19488] of
Richard S. Fuld, Jr., Christopher M. O'Meara, Joseph M. Gregory, Erin Callan, Ian T. Lowitt,
Michael Ainslie, John F. Akers, Roger S. Berlind, Thomas H. Cruikshank, Marsha Johnson
Evans, Sir Christopher Gent, Roland A. Hernandez, Henry Kaufman and John D. Macomber
(collectively, the "Insured Persons"), pursuant to section 362(d) of title 11 to the United States

Code (the "Bankruptcy Code") and Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for an order modifying the automatic stay provided for in section 362(a) of the Bankruptcy Code, to the extent applicable, to allow the Excess Policy Insurers¹ to make a payments in connection with the terms of an agreement for settlement relating to the action *In re Lehman Brothers Equity/Debt Securities Litigation*, 08 Civ. 5523 (LAK), the Insured Persons hereby file a second revised form of order approving the Motion.

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit A is the second revised proposed order reflecting modifications requested by the Debtors to the proposed order (the "Revised Proposed Order") granting the Application. Attached hereto as Exhibit B is a blackline of the Revised Proposed Order, marked to reflect the changes made to the first revised proposed order filed with the Court on September 7, 2011.

Dated: October 18, 2011
New York, New York



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¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

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